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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND
DEADLINE FOR PLAINTIFF TO FILE
A RESPONSE TO DEFENDANTS'
MOTION TO DISMISS, MOTION FOR
MORE DEFINITE STATEMENT AND
MOTION TO STAY DISCOVERY**

**(FIRST REQUEST – Response to Motion
to Dismiss, Motion for a More Definite
Statement and Motion to Stay Discovery)**

IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader (“Plaintiff”), through her counsel Richard Harris Law Firm, and Defendants Wynn Las Vegas, LLC and Wynn Resorts, Ltd. (“Defendants”), through their counsel Jackson Lewis P.C., Defendant Stephen Alan Wynn, through his counsel Peterson Baker, PLLC, and Defendant Maurice Wooden, by and through his counsel Kennedy & Couvillier, that Plaintiff shall have a brief, 21-day extension to April 10, 2020 to file a response to all pending motions.

This Stipulation is submitted and based upon the following:

1. On March 6, 2020, Defendant Wynn Las Vegas, LLC filed a Motion to Dismiss [ECF No. 35] to which Wynn Resorts, Ltd. filed a Joinder [ECF No. 36]; Defendant Stephen Alan Wynn filed a Motion to Dismiss [ECF No. 39]; and Defendant Maurice Wooden filed a motion for a more definite statement [ECF No. 33.]

2. In addition, Defendants Wynn Las Vegas, LLC and Wynn Resorts, Ltd., filed a Motion to Stay Discovery [ECF No. 38], to which Defendant Stephen Alan Wynn and Defendant Maurice Wooden filed a Joinder [ECF Nos. 40, 42].

3. Due to the complexity of the motions filed and the current complications made by the Coronavirus, Plaintiff requests the Court grant a brief, 21-day extension of the deadline to file a response to all motions to April 10, 2020.

4. This is the first request for an extension of time to file a response to Defendants’ motions.

5. This request is made in good faith and not for the purpose of delay.

6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 19th day of March, 2020.

RICHARD HARRIS LAW FIRM

JACKSON LEWIS P.C.

/s/ Burke Huber

/s/ Deverie J. Christensen

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1 *Attorney for Plaintiff*
2 *Brenna Schrader*

Attorneys for Defendants
Wynn Las Vegas, LLC and Wynn Resorts,
Ltd.

3 KENNEDY & COUVILLIER

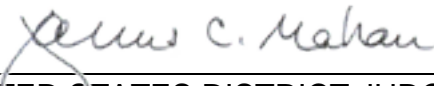
PETERSON BAKER, PLLC

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5 /s/ Maximiliano Couvillier
6 Maximiliano D. Couvillier, Bar No. 7661
7 3271 E. Warm Springs Road
8 Las Vegas, Nevada 89120
9 *Attorney for Defendant*
10 *Maurice Wooden*

/s/ Tamara Beatty Peterson
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Attorney for Defendant
Stephen Alan Wynn

11 **ORDER**

12 IT IS SO ORDERED:

13 
14 UNITED STATES DISTRICT JUDGE

15 March 20, 2020.
16 Dated: _____
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